

# DOCKETE

FILED

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

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U.S. DISTRICT COURT

ATARI, INC., a Corporation,	)	
	)	
Plaintiff,	)	Civil Action
	)	75 C 3933
v.	)	
	)	
THE MAGNAVOX COMPANY, a Corporation, and	)	<u>PLAINTIFF'S INTERROGATORIES</u>
SANDERS ASSOCIATES, INC., a Corporation,	)	<u>TO DEFENDANTS (FIRST SET)</u>
	)	
Defendants.	)	

COMES NOW plaintiff, Atari, Inc., and serves here-  
with written interrogatories to be answered by defendants,  
The Magnavox Company and Sanders Associates, Inc., under oath  
within the provisions of Rule 33 of the Federal Rules of  
Civil Procedure.

As used in these interrogatories, the term  
"DEFENDANTS' PATENTS" shall mean United States Letters Patent  
Nos. 3,659,284; 3,659,285; 3,728,480; 3,778,058; Re. 28,507;  
and Re. 28,598.

As used in these interrogatories, the term  
"PLAINTIFF'S PRODUCTS" shall mean that apparatus previously  
identified under the following designations all of which  
have been manufactured, used and/or sold by plaintiff,  
Atari, Inc. either directly or through its subsidiary

Kee Games Inc. (the designation of exhibits in the list below is not deemed to be exhaustive but merely as a guide):

PONG	See Atari Ex. 2-28; 51; 52-24; 70
SPACE RACE	See Atari Ex. 2-89; 2-9; 47-6; 47-7
WORLD CUP	See Atari Ex. 4; 5; 2-133; 2-134
GRAN TRAK 10	See Atari Ex. 7; 3-2; 3-3
TRAK 10	(Same schematic as GRAN TRAK 10)
SUPER PONG	See Atari Ex. 2-60
ELIMINATION	See Kee Ex. 10; 1-2; 1-2A
TWIN RACER	See Kee Ex. 8; 1-17; 1-20; 1-21
PONG DOUBLES	See Atari Ex. 6; 2-44
GOTCHA	See Atari Ex. 2-102; 2-103
COLOR GOTCHA	See Atari Ex. 2-116; 2-117
QUADRAPONG	See Atari Ex. 9; 2-73; 2-74
REBOUND	See Atari Ex. 8; 2-152; 2-153; 2-157; 2-158
SPIKE	See Kee Ex. 11; 1-4; 1-5; 1-6
FORMULA K	See Kee Ex. 9; 1-10; 1-11; 1-12; 1-13
COCKTAIL PONG	See Atari Ex. 53-15; <u>Dwg. 001211</u>
GRAN TRAK 20	See Atari Ex. 72
TRAK 20	(Same schematic as GRAN TRAK 20)
DR. PONG	See Atari Ex. 53-18; <u>Dwg. SD001473</u>

PIN PONG See Atari Ex. 87

QWAK See Atari Ex. 86

HIWAY See Atari Ex. 84

GOAL IV See Atari Ex. 85

SHARK JAWS See Atari Ex. 83

STEEPLECHASE See schematic drawing produced but  
not marked at deposition of  
Atari, Inc., January 16, 1976

CRASH 'N SCORE See schematic drawing produced but  
not marked at deposition of  
Atari, Inc., January 16, 1976

INDY 800 See Atari Ex. 73

TANK See Atari Ex. 74

ANTI AIRCRAFT See Atari Ex. 77

JET FIGHTER See Atari Ex. 78

CROSS FIRE See Atari Ex. 79

PURSUIT See Atari Ex. 81

COCKTAIL TABLE TANK See Atari Ex. 75

TANK II See Atari Ex. 76

COMPUTER SPACE See Nutting Exhibits 3 through 11;  
Atari Ex. 70

CONSUMER PONG See Atari Ex. 62-11; Lee Ex. 2; 3

Interrogatory No. 1: As to each claim of DEFENDANTS' PATENTS, state which, if any, of PLAINTIFF'S PRODUCTS is considered by defendants (or either of them) to infringe said claim and in each instance identify the element or elements of PLAINTIFF'S PRODUCT deemed by defendants (or either of them) to correspond to each element of the allegedly infringed claim.

Interrogatory No. 2: As to each claim of DEFENDANTS' PATENTS, state which, if any, of PLAINTIFF'S PRODUCTS is considered by defendants (or either of them) not to infringe said claim and in each instance identify the element or elements of the claim deemed by defendants (or either of them) to be lacking in the specific product to thereby avoid infringement.

Interrogatory No. 3: As to each claim of DEFENDANTS' PATENTS, state which, if any, of the commercial products, models or prototypes of defendants (or either of them) is considered by defendants (or either of them) to be covered by said claim and in each instance identify the

element or elements of the product, model or prototype  
deemed by defendants (or either of them) to correspond to  
each element of the claim.



Thomas E. Smith  
Attorney for Plaintiff,  
Atari, Inc.

Lee & Smith  
Ten South Riverside Plaza  
Suite 330  
Chicago, Illinois 60606  
(312) 726-1982

Of Counsel:

Thomas O. Herbert  
Flehr, Hohbach, Test,  
Albritton & Herbert  
160 Sansome Street - 15th Floor  
San Francisco, California 94104  
(415) 781-1989

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a copy of the foregoing PLAINTIFF'S INTERROGATORIES TO DEFENDANTS (FIRST SET) was served upon the defendant by hand delivery to defendant's counsel, James T. Williams, Esq. on this 9th day of February, 1976.

  
Thomas E. Smith